

## **REMARKS/ARGUMENTS**

Claims 1-4, 6-12 and 14-20 are pending in the present application. Claims 1, 2, 4, 9, 10, 12 and 17-20 were amended, and claims 5 and 13 were canceled. No claims were added. Reconsideration of the claims is respectfully requested in view of the above amendments and the following comments.

### **I. Specification**

Page 1 of the specification has been amended to provide the Serial Number of the related application identified therein as required by the Examiner. In addition, the Abstract paragraph has been amended to be less than 150 words as also required by the Examiner.

### **II. 35 U.S.C. § 112, Second Paragraph**

The Examiner has rejected claims 4, 12, and 20 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter, which applicants regard as the invention. This rejection is respectfully traversed.

In rejecting the claims, the Examiner states:

Claims 4 & 12 recites the limitation "the filtering and adding" in line 1. There is insufficient antecedent basis for this limitation in the claim. Claim 20 recites the limitation "the fourth and fifth instructions" in line 1. There is insufficient antecedent basis for this limitation in the claim.

Office Action dated June 29, 2007, pages 2-3.

Claims 4, 12 and 20 have been amended to correct their dependency. Claim 4 now depends from claim 3, claim 12 now depends from claim 11 and claim 20 now depends from claim 19. There is now proper antecedent basis for all terminology in claims 4, 12 and 20; and the claims now fully satisfy the requirements of 35 U.S.C. § 112, second paragraph.

Therefore the rejection of claims 4, 12, and 20 under 35 U.S.C. § 112, second paragraph has been overcome.

### **III. 35 U.S.C. § 101**

The Examiner has rejected claims 17-20 under 35 U.S.C. § 101 as being directed towards non-statutory subject matter.

In rejecting the claims, the Examiner states:

Claim 17 recites a "computer program product in a computer readable medium!" is not limited to tangible storage devices in view of Specification, page 13, lines 6-1 9, which suggests that such a medium may be a carrier wave or

transmission medium (intangible). Accordingly, claim 17 does not recite tangible manufactures, and are non-statutory subject matter.

As per claims 18-20, these claims are rejected for failing to cure the deficiencies of the above rejected base claim 17.

Claim may be amended to recite, "A computer readable recordable media for creating an Extensible-Style Language Transformation...", thereby claiming an embodiment that does not include transmission type media / transmission forms / signals.

Office Action dated June 29, 2007, page 3.

By the present Amendment, claim 17 has been amended to recite "A computer program product in a computer readable recordable medium..." Claim 17 and claims 18-20 dependent thereon now fully satisfy the requirements of 35 U.S.C. § 101 in all respects.

Therefore, the rejection of claims 17-20 under 35 U.S.C. § 101 has been overcome.

#### **IV. 35 U.S.C. § 103, Obviousness**

The Examiner has rejected claims 1-20 under 35 U.S.C. § 103(a) as being unpatentable over US Patent 6,408,311 B1 to Baisley, et al., (hereinafter "Baisley"), in view of US Patent Application Publication 2002/0194220 A1 to Sluiman, (hereinafter "Sluiman"). This rejection is respectfully traversed.

In rejecting the claims, the Examiner states:

Per claims 1, 9, and 17:

A method / apparatus / computer program product in a computer readable medium for creating an Extensible-Style Language Transformation (XSLT) document from a plurality of Unified Modeling Language (UML) model documents or Extensible Markup Language (XML) schemas created from the plurality of UML model documents, the method comprising the steps of: - providing a plurality of UML documents;

-determining at least one difference between a content of one UML document of said plurality of UML documents and a content of a second UML document of said plurality of UML documents;

-creating an XSL fragment including said at least one difference between said content of said one UML document of said plurality of UML documents and said content of said second UML document of said plurality of UML documents.

Baisley disclosed a relationship between UML objects in a repository (Col. 2: 37-43) and XML objects, including, the ability to identify differences and synchronize the differences between object models represented in different forms. Baisley disclosed (col. 2: 45) tracking changes to repository objects (UML objects) made by an external UML editing tool. Col. 6: 24-26, differences between the XML objects and the repository objects are identified.

Baisley failed to disclose determining the difference between the content of a first and second UML document, and creating a fragment including said difference. However, Sluiman disclosed [0063], XSL transforms used to reconcile complex data models in the XML metalanguage. A data expander is

capable of interpreting XSL Transforms. [0093], Reconciled data sets A' and B' (reconcile differences) are placed into C', a correct version of the divergent aspect (differences). ..necessary for the purpose of obtaining metalanguage fragments for copying into fundamental data set C'. [0095], fundamental data expander 50 expands these reconciled aspects (differences) into corresponding metalanguage within new complex data model C. ([0003], metadata schema and data instances are referred to as complex data models.) [0034], a first transform is a set of instructions that controls which divergent aspects of the complex data models are to be extracted. If the received complex data models are in the XML metalanguage and the data extractor is capable of interpreting Extensible Stylesheet Language (XSL) Transforms (XSLTs), the transform may be an XSLT.

Therefore, it would have been obvious, to one of ordinary skill in the art, at the time of the invention, to modify Baisley, to include the teachings of Sluiman, because Baisley recognized the need (col. 2: 26-3 1) for generating format descriptions to expedite interchange of metadata among repositories and modeling tools, automating the production of an XML DTD for meta models (schema document).

Office Action dated June 29, 2007, pages 4-6.

Claim 1, as amended herein, is as follows:

1. A method for creating an Extensible-Style Language Transformation (XSLT) document from a plurality of Unified Modeling Language (UML) model documents or Extensible Markup Language (XML) schemas created from the plurality of UML model documents, the method comprising the steps of:

providing a plurality of UML documents;

determining at least one difference between a content of one UML document of said plurality of UML documents and a content of a second UML document of said plurality of UML documents; and

creating an XSL template-match document fragment that includes said at least one difference between said content of said one UML document of said plurality of UML documents and said content of said second UML document of said plurality of UML documents; and

transforming a format of said one UML document to a format of said second UML document.

The Examiner bears the burden of establishing a *prima facie* case of obviousness based on the prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). For an invention to be *prima facie* obvious, the prior art must teach or suggest all claim limitations. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974). In this case, the Examiner has not met this burden because all of the recited features of the claims are not found in the cited art as believed by the Examiner. In particular, neither Baisley nor Sluiman nor their combination discloses or suggests at least the features of “creating an XSL template-match fragment that includes said at least one

difference between said content of said one UML document of said plurality of UML documents and said content of said second UML document of said plurality of UML documents”, or “transforming a format of said one UML document to a format of said second UML document” as now recited in claim 1.

Baisley is directed to a mechanism for identifying UML objects in a repository with objects in an XML file. As stated, for example, in column 2, lines 25-27, Baisley does this to automatically generate format descriptions to expedite interchange of metadata among repositories and modeling tools.

Baisley does not describe a mechanism for creating an XSL document from a plurality of UML model documents or XML schemas created from the plurality of UML model documents as recited in claim 1. At best, Baisley may disclose providing an ability to identify differences between object models represented in different forms, but the reference does not disclose or suggest, and is unrelated to, determining differences in content between different UML documents.

The Examiner acknowledges, and Applicants agree that Baisley does not disclose determining the difference between the content of a first and second UML document, and creating a fragment including said difference. The Examiner, however, cites Sluiman as disclosing these features. Applicants respectfully disagree.

Sluiman is directed to a mechanism for semantic reconciling of complex data models. In Sluiman, A transform is applied to divergent complex data models to extract fundamental data representing divergent aspects that are to be reconciled. The extracted fundamental data is then semantically displayed in a manner to identify differences to be reconciled and for reconciling them. The result is a single reconciled fundamental data set that can be expanded into a corresponding reconciled complex data model by a second transform.

Sluiman does not disclose “creating an XSL template-match fragment that includes said at least one difference between said content of said one UML document of said plurality of UML documents and said content of said second UML document of said plurality of UML documents” as now recited in claim 1. Sluiman does not disclose creating an XSL template-match fragment that includes at least one difference between the content of first and second UML documents. At best, Sluiman may disclose semantically displaying extracted fundamental data representing aspects of complex data models that diverge and that are to be reconciled. This is not the same as “creating an XSL template-match fragment that includes said at least one difference between said content of said one UML document of said plurality of UML documents and said content of said second UML document of said plurality of UML documents.” Accordingly, neither Baisley nor Sluiman discloses or suggests “creating an XSL template-match fragment that includes said at least one difference between said content of said one UML document of said plurality of UML documents and said content of said second UML document of said plurality of UML documents”, and claim 1 is not obvious in view of Baisley and Sluiman for this reason.

In addition, neither Baisley nor Sluiman, nor their combination discloses or suggests “transforming a format of said one UML document to a format of said second UML document” as now also recited in claim 1.

In rejecting original claims 5 and 13, the Examiner states:

Per claims 5 & 13:

-transforming a format of said one UML document to a format of said second UML document. Baisley disclosed relating an XML object to an UML object, to maintain versioning, track changes (col. 2: 56).

Per claims 6 & 14:

Office Action dated June 29, 2007, page 9.

As indicated above, and as acknowledged by the Examiner, Baisley does not relate to determining differences in content between different UML documents. Baisley also does not disclose or suggest transforming a format of one UML document to a format of a second UML document. Relating an XML object to a UML object to maintain versioning is not, in any way, the same as “transforming a format of said one UML document to a format of said second UML document”, and it would not be obvious in view of the cited art to include this step in the method of claim 1. Claim 1, accordingly, is also not obvious in view of the references for this reason as well.

For at least all the above reasons claim 1 is not obvious over Baisley in view of Sluiman and patentably distinguishes over the references in its present form.

Independent claims 9 and 17 have been amended in a similar manner as claim 1 and also patentably distinguish over the cited art for similar reasons as discussed above with respect to claim 1.

Claims 2-4, 6-8, 10-12, 14-16 and 18-20 depend from and further restrict one of the independent claims and also patentably distinguish over the cited art, at least by virtue of their dependency. Furthermore, many of these claims recite additional features that are not disclosed or suggested by either Baisley or Sluiman. For example, claim 7 recites that the content of one UML document comprises configuration settings for an older version of a product, and the content of the second UML document comprises configuration settings for a newer version of said product. Claim 8 recites that the content of one UML document comprises a plurality of attributes for an older version of a product, and the content of the second UML document comprises a plurality of attributes for a newer version of the product.

Baisley does not, in any way, disclose or suggest these features. The asserted teaching in Baisley of creating a new version of the repository object if a parsed XML document does not have a matching repository object is not a teaching that the contents of older and newer UML documents comprise

configuration settings for older and newer versions of the product, or that the contents of older and newer UML documents comprise attributes for older and newer versions of the product. Claims 7 and 8, accordingly, and corresponding claims 15 and 16, patentably distinguish over the cited art in their own right as well as by virtue of their dependency.

Therefore, the rejection of claims 1-20 under 35 U.S.C. § 103(a) has been overcome.

V. **Conclusion**

For at least all the above reasons, Applicants believe hat this application is now in condition for allowance. It is, accordingly, respectfully requested that the Examiner so find and issue a Notice of Allowance in due course.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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